

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	NO. 21-CR-00040-RJJ
vs.	)	
	)	Hon. Robert J. Jonker
CHRISTOPHER ALLAN BODEN, a/k/a	)	Chief United States District Judge
"Captain," LEESA BETH VOGT, a/k/a	)	
"Lis Bokt," a/k/a "Moose," and DANIEL	)	Hon. Phillip J. Green
REYNOLD DEJAGER, a/k/a "Daniel	)	United States Magistrate Judge
Reynold," a/k/a "Daniel Miester," a/k/a	)	
"Danichi,"	)	
	)	
Defendants.	)	
	)	
	)	
	)	

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**DEFENDANT DANIEL DEJAGER'S MOTION FOR DOWNWARD VARIANCE**

Daniel Reynold DeJager, by and through his attorney, Brett A. Purtzer of the Hester Law Group, Inc., P.S., moves this Honorable Court to vary downward from the applicable advisory guideline range in this matter. Under the 18 USC § 3553(a) factors and the standard for the imposition of a sentence sufficient, but not greater than necessary, a downward variance would be appropriate in this case. The basis for this requested variance is further set forth and supported in the Presentence

Report and in Defendant's Sentencing Memorandum filed on this day as well.

Respectfully submitted this 14<sup>th</sup> day of February, 2022.

HESTER LAW GROUP, INC., P.S.  
Attorneys for Defendant DeJager

By: /s/ Brett A. Purtzer  
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CERTIFICATE OF SERVICE

Lee Ann Mathews, hereby certifies under penalty of perjury under the laws of the State of Washington, that on the date set forth below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record for the plaintiff and co-defendants, if any, and hereby certify that I have mailed the document by U.S. Postal Service to Daniel DeJager, defendant.

Signed at Tacoma, Washington this 14<sup>th</sup> day of February, 2022.

/s/ Lee Ann Mathews  
LEE ANN MATHEWS